

MEMO ENDORSED

LAW OFFICES
NEIL M. SCHUSTER

SUITE 2C
555 N.E. 15th STREET
MIAMI, FLORIDA 33132

NEIL M. SCHUSTER *
ANDREW HORN
OF COUNSEL
*ALSO ADMITTED IN COLORADO &
DISTRICT OF COLUMBIA.


TELEPHONE (305) 416 - 0324
TELECOPIER (305) 416 - 0325
e-mail: neil@neilmschuster.com

February 11, 2021

BY ECF

Honorable Denise L. Cote
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

The request is denied. The
defendant must surrender as
directed by 10 a.m. on 2/26/21.
So Ordered: 02-18-2021


DENISE COTE
United States District Judge

Re: *United States v. Zalmund Zirkind, S9 19*

AGREED LETTER MOTION TO CONTINUE SURRENDER DATE FROM
FEBRUARY 26, 2021, PURIM, A JEWISH HOLIDAY, TO MARCH 1, 2021
AND TO VERIFY TIME OF SURRENDER.

Dear Judge Cote:

On behalf of Mr. Zirkind, this application respectfully seeks an opportunity to surrender to commence serving his 84-month jail term on March 1, 2021, instead of February 26, 2021, the day which commences the observance of the Jewish holiday, Purim and to confirm the time of surrender is 2 PM as per the *ore tenus* of January 15, 2021 and the JNC filed on January 15, 2021 as DE 191. Purim is the celebration of deliverance of the Jewish people from their intended annihilation. The holiday is observed the evening of February 26-27, which also commences the Sabbath. The Defendant respectfully requests his surrender be moved two days later in light of his observance of Purim. The Defendant recognizes that he will serve his term during many more holidays but respectfully seeks the opportunity to commence serving his jail term on another day.

In conflict with this Court's oral and written order, the Defendant received a letter from Christina Ramos, Administrative Assistant at the U.S. Probation Office, on February 4, 2021, stating the surrender time is 10 AM. Through this application, Mr. Zirkind also seeks to confirm the Court ordered 2 PM surrender. Counsel has reviewed this request with the assigned prosecutors who agree with the relief requested. We thank Your Honor for your review.

Respectfully submitted,

/s/ Neil M. Schuster
Neil M. Schuster

NMS:asnd

By ECF:

Josh Rothman, PTS, Intensive Supervision Specialist

Stephanie Lake, AUSA

Aline R Flodr, AUSA

Sebastian Swett, AUSA